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11 Attorneys for Charging Parties  
12 International Brotherhood of Boilermakers, Iron Shipbuilders,  
13 Blacksmiths, Forgers and Helpers, Local Union 104, AFL-CIO;  
14 Portland Metal Trades Council;  
15 Metal Trades Department, AFL-CIO; and  
16 Pacific Coast Metal Trades District Council

11 UNITED STATES OF AMERICA  
12 NATIONAL LABOR RELATIONS BOARD  
13 REGION 19  
14

15 VIGOR INDUSTRIAL, LLC,

Case No. 19-CA-135538

16 Employer,

17 and  
18

**CROSS-EXCEPTIONS**

19 INTERNATIONAL BROTHERHOOD OF  
20 BOILERMAKERS, IRON SHIPBUILDERS,  
21 BLACKSMITHS, FORGERS AND HELPERS  
22 LOCAL UNION 104, AFL-CIO; PORTLAND  
23 METAL TRADES COUNCIL; METAL TRADES  
24 DEPARTMENT, AFL-CIO; and PACIFIC COAST  
25 METAL TRADES DISTRICT COUNCIL,

Charging Parties.

1 The Charging Party joins fully in all of the Exceptions filed by Counsel for General  
2 Counsel. The Exceptions and the Brief in Support of Exceptions are incorporated herein by  
3 reference.

4 Charging Party also offers the additional Cross-Exceptions:

- 5 1. To the Order in that it fails to contain adequate remedies.
- 6 2. To the Order in that it fails to contain adequate notice posting and distribution  
7 remedies.
- 8 3. To the Board's standard notice.

9 Respectfully submitted,

10 Dated: October 13, 2015

WEINBERG, ROGER & ROSENFELD  
A Professional Corporation

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12 By: /s/ DAVID A. ROSENFELD  
13 DAVID A. ROSENFELD

14 Attorneys for Charging Parties  
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**CERTIFICATE OF SERVICE**

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years and not a party to the within action.

On October 13, 2015, I served the following documents in the manner described below:

**CROSS-EXCEPTIONS**

- ☐ (BY U.S. MAIL) I am personally and readily familiar with the business practice of Weinberg, Roger & Rosenfeld for collection and processing of correspondence for mailing with the United States Parcel Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at Alameda, California.
- ☐ (BY FACSIMILE) I am personally and readily familiar with the business practice of Weinberg, Roger & Rosenfeld for collection and processing of document(s) to be transmitted by facsimile and I caused such document(s) on this date to be transmitted by facsimile to the offices of addressee(s) at the numbers listed below.
- ☒ (BY ELECTRONIC SERVICE) By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system to the email addresses set forth below.

On the following part(ies) in this action:

Mr. Ronald K. Hooks  
Regional Director  
National Labor Relations Board, Region 19  
2948 Jackson Federal Building  
915 Second Avenue  
Seattle, WA 98174-1078  
[Ronald.hooks@nrlrb.gov](mailto:Ronald.hooks@nrlrb.gov)

Ms. Jacqueline M. Damm  
Bullard Law  
200 SW Market St., Suite 1900  
Portland, OR 97201  
[jdamm@bullardlaw.com](mailto:jdamm@bullardlaw.com)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 13, 2015, at Alameda, California.

\_\_\_\_\_  
/s/ Rhonda Fortier-Bourne  
Rhonda Fortier-Bourne

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